

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

Hearing Date and Time:
June 17, 2015 at 2:30 p.m.

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In re

Chapter 11

JEFFREY JOSEPH JEROME and
CAROLINE JEROME,

Case No. 14-75114-ast

NOTICE OF MOTION

Debtor.
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TO THE OFFICE OF THE U.S. TRUSTEE, ALL PERSONS WHO HAVE FILED REQUESTS FOR RECEIPT OF ALL NOTICES SERVED AND FILED IN THIS CASE AND ALL CREDITORS WHOSE CLAIMS ARE AFFECTED BY THIS MOTION:

PLEASE TAKE NOTICE that at 2:30 p.m. on June 17, 2015, or as soon thereafter as counsel can be heard, a hearing will be held before the Honorable Alan S. Trust, Bankruptcy Judge in his Courtroom which is located at the United States Bankruptcy Court, Long Island Federal Plaza Courthouse, Federal Plaza, Central Islip, NY 11722 for the entry of an Order: (a) voiding (i) the second mortgage lien held by Scott Berman ("Berman"), (ii) the judgment lien held by Oppenheimer & Co. Inc. ("Oppenheimer"), (iii) the judgment lien held by Kleet & Co. Inc. ("Kleet") and (iii) the judgment lien held by Lobe Holding Corp. ("Lobe") pursuant to 11 U.S.C. §§ 506(a) and 506(d) and Federal Rule of Bankruptcy Procedure ("FRBP") 3012; (b) reclassifying the proofs of claim filed by Berman (Claim No. 6) and Oppenheimer (Claim No. 3) as wholly unsecured claims; and (c) for such other or further relief to the Debtors and their Estate as is just and proper.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief sought in the Motion shall be in writing and served so as to be received by: (i) the Clerk of the United States Bankruptcy Court, 290 Federal Plaza, P.O. Box 9013, Central Islip, New York, 11722; (ii) The Law Office of Michael G. Mc Auliffe, Esq. 68 South Service Road, Suite 100, Melville, New

York, 11747; and (iii) The Office of the United States Trustee, 290 Federal Plaza, Central Islip, New York, 11722, Attn. Alfred M. Dimino, Esq., no later than June 10, 2015 at 5:00 p.m.

PLEASE TAKE FURTHER NOTICE, that your response to the Motion is not required and you need not appear at the Hearing if you do not object to the relief requested in the Application.

Dated: Melville, New York
May 28, 2015

LAW OFFICES OF MICHAEL G. MC AULIFFE
Counsel to the Debtors

By /s/ Michael G. Mc Auliffe
Michael G. Mc Auliffe, Esq.
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